

Sherianne Laba  
CA Bar ID No.: 204247  
Osterhout Berger Daley  
521 Cedar Way, Suite 200  
Oakmont, PA 15139  
Telephone: (412) 794-8003  
Facsimile: (412) 794-8050  
slaba@obd.law

Attorney for Plaintiff, Amanda Rachelle Metzger

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO COURTHOUSE DIVISION**

AMANDA RACHELLE METZGER,

Plaintiff,

v.

CAROLYN COLVIN,  
Acting Commissioner of Social Security,<sup>1</sup>

Defendant.

Case No.: 2:24-cv-02639-CSK

**STIPULATION AND PROPOSED ORDER  
FOR AN EXTENSION OF TIME FOR  
PLAINTIFF TO FILE HER MOTION  
FOR SUMMARY JUDGMENT AND  
SUPPORTING BRIEF**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Plaintiff shall have an extension of time to file her Motion for Summary Judgment and Supporting Brief. This is Plaintiff's first request for an extension.

Plaintiff respectfully requests that this Court grant a 30-day extension to file her Motion

<sup>1</sup> Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024, and is automatically substituted as a party pursuant to Fed. R. Civ. P. 25(d). *See also* section 205(g) of the Social Security Act, 42 USC 405(g) (action survives regardless of any change in the person occupying the office of Commissioner of Social Security). No further action needs to be taken to continue this suit by reason of the last sentence of section 405(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 for Summary Judgment and Supporting Brief. There is good cause for this request. The certified  
2 administrative record exceeds 3,000 pages, and Plaintiff intends on raising multiple fact-intensive  
3 issues. This, combined with counsel's work load, has made this request become necessary.  
4 Plaintiff will endeavor to submit her brief in advance of the extended deadline, but based on the  
5 foregoing respectfully requests an extension in order to ensure that the issues are fully and  
6 concisely presented to the Court.  
7

8 The parties further stipulate that the Court's Scheduling Order shall be modified  
9 accordingly.

10 Respectfully submitted,

11  
12 December 23, 2024

13 DATED

/s/ Sherianne Laba

SHERIANNE LABA, ESQUIRE

Attorney for Plaintiff, Amanda Rachelle Metzger

14  
15 December 23, 2024

16 DATED

By: /s/ Justin L. Martin

(\*as authorized by email on December 20, 2024)

Special Assistant U.S. Attorney

Attorney for Defendant

17  
18 **ORDER**

19  
20 Pursuant to the parties' stipulation, IT IS SO ORDERED that Plaintiff Amanda Rachelle  
21 Metzger shall have a thirty (30) day extension, until January 31, 2025, to file her opening brief.  
22 All other deadlines to be determined by reference to the Supplemental Rules for Social Security  
23 Actions under § 405(g) and the Court's procedural order.  
24

25 DATED: December 23, 2024



26 CHI SOO KIM

UNITED STATES MAGISTRATE JUDGE

27 5, metz.2639.24

28 Extension of Time Stipulation, (Case # 2:24-cv-02639-CSK)